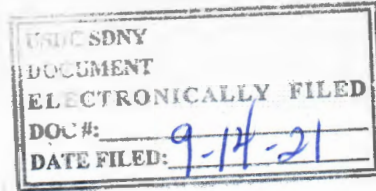


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September 13, 2021

VIA ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Doe v. Columbia University, 1:20-cv-05019 (LAK) (S.D.N.Y.)

Dear Judge Kaplan:

We represent Defendant The Trustees of Columbia University in the City of New York ("Columbia") in the above-captioned action. Pursuant to Your Honor's Individual Practices, Columbia moves to file with redactions the exhibits to its motion to dismiss the amended complaint. In compliance with Your Honor's Individual Practices, the Court's standing order No. 19-MC-00583, and the Court's Electronic Case Filing Rules & Instructions, Columbia is publicly filing the exhibits with the proposed redactions and filing under seal unredacted versions with the proposed redactions highlighted.

The exhibits to Columbia's motion to dismiss the amended complaint include or could otherwise reveal Plaintiff's and Jane Roe's identities. On November 6, 2020, the Court entered an order in this action allowing the parties to use pseudonyms for both Plaintiff John Doe and the non-party student complainant, Jane Roe ("Pseudonym Order," ECF 28). And on August 2, 2021, the Court granted Plaintiff's unopposed motion to file redacted exhibits to Plaintiff's amended complaint ("Redaction Order," ECF 48). Accordingly, consistent with the Pseudonym and Redaction Orders already entered by this Court, Columbia seeks to redact portions of Exhibits B, C, and D being filed in conjunction with Columbia's motion to dismiss the amended complaint. The proposed redactions are consistent with the redactions in Plaintiff's Exhibits A, B, and C attached to his amended complaint, which were already approved by this Court. *See* ECF 48, 51-1, 51-2, 51-3.

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The parties have conferred on the proposed redactions and Plaintiff agrees to the specific redactions being proposed.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record

Granted

SO ORDERED

[Signature]

LEWIS A. KAPLAN, USDJ

9/14/21